

IN CLERK'S OFFICE  
U.S. DISTRICT COURT E.D.N.Y.

★ JUL 30 2013 ★

BROOKLYN OFFICE

July 13, 2013

U.S. Clerk of Court  
Eastern District of New York

Case: 11-623 (JG)

Dear Judge Gleeson

In Exhibit 1 you will find a copy of document 15 which was mailed to my ex-attorneys regarding my discovery.

Since then I never been provide with any part of the discovery from them, regardless they had in their possession.

I would like to be provide with the page 288, 289 and 290 which I'm missing. Look exhibit 2 for more information.

Yours Sincerely  
Agon Hasbajrami  
*Agon*

Enclosures  
cc: Quljano & Ennis  
381 Park avenue South  
Suite 701  
New York, NY 10016

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Case: 11-623(JG)

Dear Judge Gleeson

In Exhibit 2 you will find a list of discovery sent from my attorney.

In my contact with him is stated that he doesn't possess the rest of it.

I would like to be provided with the rest of discovery which is mentioned as below:

- 1) Criminal Complaint transcript
- 2) Grand Jury Transcripts
- 3) Docket sheets
- 4) Sentence Hearing Minutes
- 5) Copy of inventory list of the property taken from my apartment in Brooklyn
- 6) New PSR (that you ordered Probation Officer to redo to be sent to BOP)

Yours very truly  
Agon Hasbajrami  
*Agon*

EXHIBIT 1



U.S. Department of Justice

*United States Attorney  
Eastern District of New York*

SDD  
F.#2011R00783

*271 Cadman Plaza East  
Brooklyn, New York 11201*

December 23, 2011

**Via Federal Express**

Nancy Lee Ennis, Esq.  
Quijano & Ennis  
381 Park Avenue South,  
Suite 701  
New York, NY 10016

Re: United States v. Agron Hasbajrami,  
Criminal Docket No. 11-623 (JG)

Dear Ms. Ennis:

Pursuant to Rule 16 of the Federal Rules of Criminal Procedure, enclosed please find additional discovery materials, provided under the terms of the Protective Order Pertaining to Unclassified Discovery Materials entered by the Court on November 16, 2011 (the "Order"), and the December 23, 2011 stipulation between the parties regarding draft summary translations of foreign language documents. Pursuant to ¶ 3 of the Order, the enclosed documents are SENSITIVE DISCOVERY MATERIALS and must be handled accordingly.

Enclosed please find copies of the defendant's email communications, along with draft summary foreign language translations, Bates-stamped 83 to 287. In addition, enclosed please find copies of the defendant's Western Union wire transfer records, on a CD Bates-numbered 288, and JPMorgan Chase banking records, on a CD Bates-numbered 289, along with hard copy printouts of the defendant's Western Union and Moneygram records, Bates-numbered 290 to 304.

In addition, a copy of a search warrant for the defendant's residence along with the underlying application is enclosed, Bates-numbered 305 to 340. Also enclosed please find draft summary translations of documents recovered from the

defendant's residence pursuant to the execution of the search warrant, Bates-numbered 341 to 368. Lastly, enclosed please find an FBI report listing the items recovered from the defendant at the times of his arrest, Bates-numbered 369 to 370. We will make the items listed available for your inspection at your request.

In addition, the government is in possession of digital media seized from the defendant's computer. If you will kindly provide us with a two-terabyte hard drive, we will arrange to make a copy of this information for your review. In the alternative, if you would prefer, we can make the computer materials available for your inspection at a mutually agreeable time and location.

If you have any questions or requests, please do not hesitate to contact us. The government will supplement this letter as appropriate.

Very truly yours,

LORETTA E. LYNCH  
United States Attorney

By: /s/  
Matthew Amatruda  
Seth D. DuCharme  
Assistant United States Attorneys  
(718) 254-7012/6021

Enclosures

cc: Clerk of Court (JG) (w/o enclosures)

TRULINCS 65794053 - HASBAJRAMI, AGRON - Unit: FAI-C-R

FROM: Bachrach, Michael  
TO: 65794053  
SUBJECT: RE: PACKAGE  
DATE: 05/30/2013 11:06:04 AM

EXHIBIT 2

Agron,

I think you can just state that the package will contain legal mail, including discovery. However, below is an itemized list of all of the documents that are in the specific package that appears to be under dispute. I have since sent you additional files, which you should have received by now. Please advise if you have still not received anything and I will look into it. Regardless, the files in the package that was rejected are as follows:

- (1) Indictment, dated, September 8, 2011 (ecf # 1)
- (2) Superseding Indictment, dated, January 26, 2012 (ecf # 20)
- (3) Memorandum of Law In Support of the Government's Motion for a Permanent Order of Detention, dated, September 9, 2011 (ecf # 3)
- (4) Notice of Intent to Use Foreign Intelligence Surveillance Act Information, dated, September 13, 2011 (ecf # 9)
- (5) Government's Motion for a Pretrial Conference Pursuant to 18 U.S.C. App. III (CIPA) Section 2, dated, September 29, 2011 (ecf # 10)
- (6) Protective Order Pertaining to Unclassified Information, dated, November 21, 2011 (ecf # 13)
- (7) Protective Order Regarding Classified Information, dated, March 23, 2012 (ecf # 27)
- (8) Defendant's Sentencing Memorandum, dated, November 21, 2012 (redacted copy with attachments) (ecf # 38)
- (9) Defendant's Sentencing Memorandum, dated, November 21, 2012 (unredacted copy without attachments) (filed under seal)
- (10) Government's Sentencing Memorandum, dated, November 21, 2012 (ecf # 39)
- (11) Exhibit A to the Government's Sentencing Memorandum (filed under seal)
- (12) Government's Supplemental Sentencing Memorandum, dated, January 7, 2013 (ecf # 42)
- (13) Defendant's Supplemental Sentencing Memorandum, dated, January 7, 2013 (with attachments) (ecf # 43)
- (14) Rule 16 letter, dated, September 29, 2011 (re Bates # 1-40) (ecf # 11)
- (15) Rule 16 letter, dated, December 23, 2011 (re Bates # 83-370) (ecf # 15)
- (16) Rule 16 letter, dated, January 27, 2012 (re Bates # 371-427) (ecf # 19)
- (17) Rule 16 letter, dated, March 1, 2012 (re Bates # 428) (ecf # 22)
- (18) Rule 16 letter, dated, March 27, 2012 (re Classified discovery) (ecf # 28)
- (19) Rule 16 letter, dated, March 27, 2012 (re Bates # 455-467) (ecf # 29)
- (20) Rule 16 letter, dated, March 30, 2012 (re Bates # 468-968) (ecf # 30)
- (21) Rule 16 letter, dated, June 18, 2012 (re foreign witness interview) (ecf # 33)
- (22) Foreign witness interview referenced in June 18, 2012 Rule 16 letter.
- (23) FBI 302, dated, September 7, 2011 (summary of the defendant's post-arrest statements) (Bates # 41-47)
- (24) FBI 302, dated, September 19, 2011 (log maintained during defendant's post-arrest interrogation) (Bates # 48-52)
- (25) FBI 302, dated, September 14, 2011 (summary of the defendant's post-arrest statements) (Bates # 53-60)
- (26) FBI 302, dated, September 15, 2011 (summary of the defendant's post-arrest statements) (Bates # 61-75)
- (27) FBI 302, dated, September 14, 2011 (summary of the defendant's post-arrest statements) (Bates # 76-78)
- (28) FBI Verbatim Translation, dated, November 15, 2011 (Bates # 79-82)
- (29) Unclassified FISA derived material (Bates # 83-287)
- (30) Western Union summary (Bates # 290-297) 288, 289, 290 is missing
- (31) MoneyGram summary (Bates # 298-300)
- (32) Western Union summary (Bates # 301-304)
- (33) Attachment A to warrant application (Bates # 306-309)
- (34) Affidavit in Support of Application for Search Warrant, dated, September 6, 2011 (Bates # 310-340)
- (35) FBI Summary Translation (Bates # 341-346)
- (36) FBI Summary Translation (Bates # 347-350)
- (37) FBI Summary, dated, November 17, 2011 (Bates # 351-353)
- (38) FBI Verbatim Translation (Bates # 354-368)
- (39) FBI 302, dated, September 6, 2011 (inventory) (Bates # 369-370)
- (40) Unclassified FISA derived material (Bates # 371-427)
- (41) Unclassified email and Facebook posts (Bates # 429-456)
- (42) Miscellaneous unclassified propaganda (Bates # 457-467)
- (43) Email (Bates # 468-479)
- (44) Employment cover letters and resume (Bates # 480-484)
- (45) Email (Bates # 485-732)